

1 TIMOTHY CHEN SAULSBURY (CA SBN 281434)  
TSaulsbury@mofo.com  
2 JOYCE C. LI (CA SBN 323820)  
JoyceLi@mofo.com  
3 IAN A. BENNETT (CA SBN 346555)  
IBennett@mofo.com  
4 CLINTON W. EWELL (CA SBN 353961)  
CEwell@mofo.com  
5 MORRISON & FOERSTER <sup>LLP</sup>  
425 Market Street,  
6 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
7 Facsimile: 415.268.7522

8 Attorneys for Defendant  
HYPERDOC INC. d/b/a RECALL.AI  
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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION  
13

14 GONG.IO, INC.,

15 Plaintiff,

16 v.

17 HYPERDOC INC. D/B/A RECALL.AI,

18 Defendant.  
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Case No. 5:25-cv-1026-NW

**STIPULATED REQUEST FOR ORDER  
CHANGING TIME AND [PROPOSED]  
ORDER**

Judge: Hon. Noël Wise

Pursuant to N.D. Cal. Civil Local Rule 6-2, Plaintiff Gong.io, Inc., (“Gong”) and Defendant Hyperdoc Inc. d/b/a Recall.ai (“Recall”) file this stipulated request for an order changing time to request that:

1. The deadline for Recall to respond to Gong’s Amended Complaint, filed June 27, be moved from July 11, 2025 to July 23, 2025—an extension of eight business days to accommodate travel by Defense counsel.
2. The deadline for Disclosure of Asserted Claims and Infringement Contentions (Patent L.R. 3-1 and 3-2) be moved from July 22, 2025 to July 25, 2025—an extension of three business days to accommodate time needed for discovery.
3. The deadline for Invalidity Contentions (Patent L.R. 3-3 and 3-4) be moved from September 5, 2025 to September 10, 2025—an extension of three business days (from the Patent L.R. 3-3 deadline with the extended Infringement Contentions deadline) to accommodate Defense counsel’s five-day jury trial scheduled for August 25, 2025.

To maintain the deadlines contemplated in the Civil and Patent Local Rules in view of the above extensions, and to accommodate holidays, the parties further stipulate and request that:

4. The deadline for Exchange of Proposed Terms for Construction (Patent L.R. 4-1) be moved from September 19, 2025, to September 24, 2025.
5. The deadline to Exchange Preliminary Claim Constructions and Extrinsic Evidence (Patent L.R. 4-2) be moved from October 10, 2025, to October 15, 2025.
6. The deadline for Damages Contentions be moved from October 27, 2025, to October 30, 2025.
7. The deadline for the Joint Claim Construction and Prehearing Statement and Expert Reports (Patent L.R. 4-3) be moved from November 4, 2025 to November 12, 2025—an additional extension of one business day to accommodate the Veterans day holiday.
8. The deadline for Responsive Damages Contentions be moved from November 26,

2025, to December 1, 2025—an additional extension of one business day to accommodate the Thanksgiving holiday.

9. The deadline for the Responsive Claim Construction Brief (Patent L.R. 4-5(b)) be moved from January 2, 2026, to January 9, 2026—an additional extension of five business days to accommodate the winter holidays.

10. The deadline for the Reply Claim Construction Brief be moved from January 9, 2026, to January 16, 2026.

11. The deadline for the Damages Contention Meeting (Civ. L.R. 3-10) be moved from January 26, 2026, to January 30, 2026.

The current schedule and the parties' requested modifications are summarized below:

Event	Current Deadline	Requested Modification
Deadline for Recall to Respond to the Amended Complaint	July 11, 2025	July 23, 2025
Disclosure of Asserted Claims and Infringement Contentions (Patent L.R. 3-1 and 3-2)	July 22, 2025	July 25, 2025
Invalidity Contentions (Patent L.R. 3-3 and 3-4)	September 5, 2025	September 10, 2025
Exchange of Proposed Terms for Construction (Patent L.R. 4-1)	September 19, 2025	September 24, 2025
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Patent L.R. 4-2)	October 10, 2025	October 15, 2025
Damages Contentions (Patent L.R. 3-8)	October 27, 2025	October 30, 2025
Joint Claim Construction and Prehearing Statement and Expert Reports (Patent L.R. 4-3)	November 4, 2025	November 12, 2025
Responsive Damages Contentions	November 26, 2025	December 1, 2025
Completion of Claim Construction Discovery	December 4, 2025	-
Opening Claim Construction Brief (Patent L.R. 4-5(a))	December 19, 2025	-
Complete ADR	December 31, 2025	-
Responsive Claim Construction Brief (Patent L.R. 4-5(b))	January 2, 2026	January 9, 2026
Reply Claim Construction Brief (Patent L.R. 4-5(c))	January 9, 2026	January 16, 2026

Tutorial hearing	January 21, 2026 2pm	-
Damages Contention Meeting (Civ. L.R. 3-10)	January 26, 2026	January 30, 2026
Claim construction hearing	February 4, 2026 at 2pm	-
Close of Fact Discovery	April 17, 2026	-
Opening Expert Reports	May 15, 2026	-
Rebuttal Expert Reports	June 12, 2026	-
Close of Expert Discovery	July 3, 2026	-
Deadline to File Dispositive/Daubert Motions	Motions: July 24, 2026 Responses: August 7, 2026 Replies: August 14, 2026	-
Last Day to Hear Dispositive/Daubert Motions	September 16, 2026 at 9:00 a.m.	-
Joint Pretrial Conference Statement	November 4, 2026	-
Pretrial Conference	November 18, 2026 at 2:00 p.m.	-
Trial	November 30, 2026 at 9:00 a.m. (5 days)	-

The only prior time modification in the case was rescheduling the Case Management Conference (ECF No. 19) and a stipulated extension for Recall to respond to the complaint (ECF No. 23).

The proposed modifications do not affect any hearing dates, discovery cutoffs, dispositive motion deadlines, or trial. Moreover, if Recall moves to dismiss the Amended Complaint, the proposed modification will allow that motion to be heard on October 1, 2025, the previously scheduled hearing date for Recall's prior motion to dismiss (ECF No. 33).

Pursuant to Civ. L.R. 6-2, a supporting declaration is attached.

Dated: July 2, 2025

ORRICK, HERRINGTON & SUTCLIFF LLP

By: /s/ Raghav Krishnapriyan

Raghav Krishnapriyan

*Attorneys for Plaintiff*  
GONG.IO, INC.

1 Dated: July 2, 2025

MORRISON & FOERSTER LLP

2  
3 By: /s/ Timothy C. Saulsbury

4 Timothy C. Saulsbury

5 *Attorneys for Defendant*

6 HYPERDOC INC. d/b/a RECALL.AI  
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**Attestation Re Electronic Signatures**

I, Timothy Saulsbury, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 2, 2025

By: /s/ Timothy C. Saulsbury  
Timothy C. Saulsbury

**[PROPOSED] ORDER**

Good cause appearing, Gong.io, Inc and Hyperdoc Inc. d/b/a Recall.ai's Request for Order Changing Time is **GRANTED**.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated:

By: \_\_\_\_\_  
Honorable Noël Wise  
United States District Court Judge